

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

) MDL No. 2419
) Dkt. No. 1:13-md-2419-RWZ

This Document Relates to:

Suits Naming the Tennessee Clinic Defendants

**JOINDER IN THE SAINT THOMAS ENTITIES' OBJECTIONS TO ORDER DENYING
MOTION TO DISSOLVE PROTECTIVE ORDERS AND LIFT STAYS AND REQUEST
FOR RULING ON OMNIBUS MOTION [DOC. 2908]**

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD; Specialty Surgery Center, PLLC; Kenneth Lister, MD; Kenneth Lister, MD, PC; and Donald Jones, MD (collectively “Tennessee Clinic Defendants”) join in the Saint Thomas Entities’ Objections to Order Denying Motion to Dissolve Protective Orders and Lift Stays and Request for Ruling on Omnibus Motion at Doc. 2908.

The Tennessee Clinic Defendants adopt and incorporate as if stated fully herein the Saint Thomas Entities' filing at Doc. 2908, including the arguments set forth and the relief requested. The Tennessee Clinic Defendants are similarly situated to the Saint Thomas Entities and respectfully request that the Court grant the relief sought by the Saint Thomas Entities' filing at Doc. 2908.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

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* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 23rd day of May, 2016.

/s/ Chris J. Tardio

Chris J. Tardio